

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Lyonel Jean-Louis
Debtor 1

Credit Acceptance Corporation
Movant(s)

v.

Lyonel Jean-Louis
Nicole M. Jean-Louis (Non-Filing Co-Debtor)

Respondent(s)

Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
Additional Respondent

Chapter 13

Case No. 1:19-BK-03570-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 35

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Lyonel Jean-Louis, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
5. Paragraph 5 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Dated: August 25, 2020

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, August 25, 2020, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

William Craig, Esquire
Morton & Craig, LLC
110 Marter Avenue, Suite 301
Moorestown, NJ 08057
Counsel for Movant(s)

Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, Pa.C.P., Paralegal for
Paul D. Murphy-Ahles, Esquire